### IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF TEXAS SAN ANTONIO DIVISION

#### **UNOPPOSED MOTION FOR CONTINUANCE**

# TO THE HONORABLE JUDGE OF SAID COURT, UNITED STATES DISTRICT JUDGE FOR THE WESTERN DISTRICT OF TEXAS, SAN ANTONIO DIVISION:

Now comes Defendant, MARK ANTHONY GRIMES, by and through his undersigned counsel, and respectfully moves this Honorable Court for an order continuing his scheduled hearings and in support would show the following:

I.

Plea agreement for MARK ANTHONY GRIMES is currently due on November 20, 2014. Jury selection and Trial are scheduled for December 8, 2014.

II.

KERRISA CHELKOWSKI and SAM LOCK need additional time, due to ongoing discovery. KERRISA CHELKOWSKI and SAM LOCK hereby respectfully request additional time to review all discovery and confer with AUSA Tracy Thompson.

III.

Assistant United States Attorney Tracy Thompson is unopposed to said Motion.

This Motion is made not for the purposes of delay, but that justice may be served.

WHEREFORE, PREMISES CONSIDERED, Defendant, MARK ANTHONY GRIMES, respectfully requests this Honorable Court to grant this Motion for Continuance, and for such other and further relief as this Honorable Court deems just and proper.

Respectfully submitted,

KERRISA CHELKOWSKI Law Office of Kerrisa Chelkowski 1017 South Alamo San Antonio, TX 78210 Office (210) 228-9393 Fax (210) 226-7540

BY: /KERRISA CHELKOWSKI/ KERRISA CHELKOWSKI STATE BAR NO: 24034373

SAM LOCK Law Office of Sam Lock 1017 South Alamo San Antonio TX 78210 Office (210) 228-9393 Fax (210) 226-7540

BY: /SAM LOCK/ SAM LOCK STATE BAR NO: 24000470

ATTORNEYS FOR DEFENDANT: MARK ANTHONY GRIMES

## **CERTIFICATE OF SERVICE**

We do hereby certify that a true and correct copy of the foregoing Motion for Continuance was electronically filed with the Clerk of this Honorable Court using the CM/ECF system which will send notification electronically to the United State's Attorney's Office.

SIGNED on this the 19<sup>th</sup> day of November, 2014.

BY: /KERRISA CHELKOWSKI/ KERRISA CHELKOWSKI

### IN THE UNI TED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF TEXAS SAN ANTONIO DIVISION

UNITED STATES OF AMERICA VS. MARK ANTHONY GRIMES	<pre> § § CRIMINAL NO. SA-14-CR-0790(1)-OLG § § § §</pre>
	<u>ORDER</u>
On this date came on to be co	onsidered Defendant MARK ANTHONY GRIMES
Motion for Continuance, and said Motion	on is hereby: GRANTED
Signed on this the	day of, 2014.
	UNITED STATES DISTRICT JUDGE